**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHEILA CARSON,	)	
	)	**Case No. 08 C 50**
Plaintiff,	)	
	)	**Judge Gottschall**
v.	)	
	)	**Magistrate Judge Ashman**
P.O. R. BRIONES # 19024, individually	)	
	)	**Jury Demand**
Defendants.	)	
	)	

Demand

**<u>PLAINTIFF'S MOTION FOR LEAVE TO FILE HER
SECOND AMENDED COMPLAINT AT LAW</u>**

NOW COMES the Plaintiff, SHEILA CARSON, by and through her attorneys, Gregory

E. Kulis and Associates, and asks this Honorable Court for leave to file Plaintiff's Second

Amended Complaint at Law pursuant to Fed. R. Civ. Proc. 15(a). In support of her request,

Plaintiff states as follows:

1.   On January 3, 2008, Plaintiff filed her Complaint at Law against Defendant JOHN

DOES 1-2, asserting a claim of false arrest in violation of Plaintiff's rights protected by 42

U.S.C. §§ 1983 and 1988 and a state law claim of malicious prosecution.

2.   On June 16, 2008, Plaintiff filed her First Amended Complaint, naming

Defendant Officer Ruben Briones.

3.   Review of documents recently received indicates that the facts support the

inclusion in this action of a second officer, Officer Edison Cuzallos.

4.   Accordingly, the Plaintiff seeks leave to file her proposed Second Amended

Complaint (a copy of which is attached).

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5.   Plaintiffs' proposed Second Amended Complaint:

     a. Asserts a false arrest claim and a state law malicious prosecution claim by

     Plaintiff against Officer Edison Cuzallos, #89507.

6.   No party will be prejudiced by this motion.

7.   The Plaintiff does not bring this motion to cause undue delay.

WHEREFORE, Plaintiff SHEILA CARSON respectfully requests this Honorable Court

to enter an order granting her leave to leave to file Plaintiff's Second Amended Complaint at

Law pursuant to Fed. R. Civ. Proc. 15(a), and for such other relief the Court deems appropriate.

                    Respectfully submitted,
                    SHEILA CARSON

        BY: /s/ Ronak Patel
             One of Plaintiff's Attorneys

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